



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE PETROBRAS SECURITIES LITIGATION

This Document Applies to:

*Al Shams Investments Limited, et al. v. Petróleo Brasileiro S.A.*  
– *Petrobras, et al.*, No. 15-cv-6243 (JSR)

No. 14-cv-9662 (JSR)

**STIPULATIONS AND ORDER**

WHEREAS, on August 7, 2015, Plaintiffs Al Shams Investments Limited and Wafic Rida Saïd (“Plaintiffs”) filed a complaint (“Complaint”) against, inter alia, Defendant Petróleo Brasileiro S.A. – Petrobras (“Defendant”);

WHEREAS, on November 9, 2015, Plaintiffs filed an Amended Complaint (“Amended Complaint”) against, inter alia, Defendant;

WHEREAS, on August 21, 2015, Petróleo Brasileiro S.A. – Petrobras; Petrobras Global Finance B.V.; Theodore M. Helms; Banca IMI S.p.A.; Banco Bradesco BBI S.A.; Bank of China (Hong Kong) Limited; BB Securities Ltd.; Citigroup Global Markets Inc.; HSBC Securities (USA) Inc.; Itau BBA USA Securities, Inc.; J.P. Morgan Securities LLC; Merrill Lynch, Pierce, Fenner & Smith Incorporated; Mitsubishi UFJ Securities (USA), Inc.; Morgan Stanley & Co. LLC; Scotia Capital (USA) Inc.; and Standard Chartered Bank (“Certain Individual Action Defendants”) moved to dismiss the complaints in eleven actions (“August 21, 2015 Motion to Dismiss”), namely: *Dimensional Emerging Markets Value Fund, et al. v. Petróleo Brasileiro S.A – Petrobras*, No. 15-cv-2165 (JSR); *Skagen, et al. v. Petróleo Brasileiro S.A. – Petrobras, et al.*, No. 15-cv-2214 (JSR); *New York City Employees’ Retirement System, et al. v. Petróleo Brasileiro S.A. – Petrobras, et al.*, No. 15-cv-2192 (JSR); *Transamerica Income Shares, Inc., et al. v. Petróleo Brasileiro S.A. – Petrobras, et al.*, No. 15-cv-3733 (JSR); *Aberdeen Emerging*

*Markets Fund, et al. v. Petróleo Brasileiro S.A. – Petrobras*, No. 15-cv-3860 (JSR); *Ohio Public Employees Retirement System v. Petróleo Brasileiro S.A. – Petrobras, et al.*, No. 15-cv-3887 (JSR); *Central States Southeast and Southwest Areas Pension Fund v. Petróleo Brasileiro S.A. – Petrobras, et al.*, No. 15-cv-3911 (JSR); *Washington State Investment Board v. Petróleo Brasileiro S.A. – Petrobras, et al.*, No. 15-cv-3923 (JSR); *Aberdeen Latin American Income Fund Limited, et al. v. Petróleo Brasileiro S.A. – Petrobras*, No. 15-cv-4043 (JSR); *NN Investment Partners B.V., et al. v. Petróleo Brasileiro S.A. – Petrobras, et al.*, No. 15-cv-4226 (JSR); and *Aura Capital Ltd. v. Petróleo Brasileiro S.A. – Petrobras, et al.*, No. 15-cv-4951 (JSR);

WHEREAS, on October 19, 2015, the Court entered an order granting in part and denying in part the August 21, 2015 Motion to Dismiss (“October 19, 2015 Order”);

IT IS HEREBY STIPULATED AND AGREED by and between the Plaintiffs and the Defendant, through their undersigned counsel, subject to approval by the Court, as follows:

1. Defendant shall answer the Amended Complaint by December 11, 2015;
2. All arguments that Certain Individual Action Defendants made in the August 21, 2015 Motion to Dismiss shall be deemed made with respect to the Amended Complaint;
3. The rulings set forth in the Court’s October 19, 2015 Order shall apply equally to the Amended Complaint;
4. Nothing in this Stipulation shall be construed as a waiver of any defense available to Defendant.

Dated: November 18, 2015  
New York, New York

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SO ORDERED:

11-21-15

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